

PERMIT EFFICIENCY IMPLEMENTATION PLAN							
Virginia Water Protection (VWP)							
Opp#	Opportunity	TASK	TASK DESCRIPTION	Target Completion Date	LEAD (Team)	ACTIONS	Status
1	Improve pre-application process and completeness review	1	Encourage participation in meaningful pre application process	6/1/2006	Harold, Kudlas (Parolari)		on track
		1A	Identify categories of projects most appropriate for pre-application process			Model after water supply planning pre-app process in VWP regulation revisions; select subset of activities appropriate for pre-app	
		1B	Evaluate options to incentivize participation			Consider incentives such as quicker review times	
		1C	Formalize preapp process and way to document mtg results			Make list of what is expected from applicant and agency; Place process on DEQ VWP website	
		2	Clarify relationship between permit fee submittal and complete application	4/1/2006	Winn	1. Clarify manual; 2. place on DEQ VWP web page. BW 12/20/05: Drafted research document to show inconsistencies and what needs to be revised; need review/discussion by management	on track
		3	Evaluate use of Engineering Surveyors Institute for administrative completeness review	10/1/2006	Harold (Winn, Parolari, Davis)	1. Research ESI; 2. research what other states doing; 3. explore pro/cons. BW 12/21/05: Googled ESI on web for information (see document on U:)	on track
2	Improve alignment between USACE and VADEQ permit review processes	1	ID opportunities to reduce or eliminate duplication and redundancies and prepare strategy and implementation plan, to include increasing scope of SPGP and explore program delegation with EPA	7/1/2006	Gilinsky/Frahm (Harold, Winn, Davis)	1. Review outcome of SPGP annual meeting;(done) 2. request that Corps approve DEQ processing Activity 1/Category C projects (done); 3. write letter to EPA on full delegation, including cost benefit analysis; 4. articulate problems w/ disconnect, propose necessary guidance, regulation changes, or law changes, and recommend changes to SPGP SOP;.	on track
		2	Evaluate solutions to the disconnect in timelines for USCOE permits and DEQ completeness determinations; Resolve other permit overlaps and conflicting statutory timelines between VADEQ and USACE permit processes	11/1/2006	Harold (Parolari, Winn)	Use swim lane diagram to find opportunities for streamlining between VADEQ, USACE and include other state agencies	need to start
		3	Establish protocol to coordinate DEQ and USCOE site visits to minimize delays for permittees	5/1/2006	Harold (Parolari, Winn)	research current MOA/MOU regarding site visits, and if necessary, write letter to Bob Hume at Corps requesting the Corps Staff notify DEQ staff when scheduling and conducting site visits	on track

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3	Improve multi-agency coordination (DEQ, USACE, DCR, VMRC, others)	1	Clarify lead agency role and responsibilities	3/1/2006	Harold, Winn		Complete
		2	Strategy for reducing DEQ's "no permit required" work load associated with federal general permits	5/1/2006	Harold (Henicheck, Parolari, Crowther)	1. develop a form letter when DEQ staff suspects NPR situation; 2. issue DEQ guidance regarding tracking of NPR in CEDS	on track
		3	Develop process for improved coordination and conflict resolution	See VWP-6	Gilinsky	Formal process has been implemented	Complete
		4	Evaluate use of Interagency teams / coordination improvements for development projects	6/1/2006	Harold, Davis (VWP regional managers)	1. DEQ program managers will explore NRO model and will evaluate how to fit to their regions	on track
		5	Build on MOUs with other agencies to streamline interactions in areas such as endangered species, historic resources and others	12/1/2006	Harold, Winn	1. Revise existing MOUs with DCR and DGIF concerning reviews; 2. Issue DEQ staff guidance (done. BW 12/20/05); 3. Conduct staff training on reviews at annual VWP meeting in May 4. Consider assuming lead role in endangered species and historic resource reviews	on track
		6	Clarify differences between state and federal endangered species lists to reduce applicant confusion and uncertainty	3/1/2006	Harold, Winn		Complete
		7	Minimize issuance of dredging permits that don't result in additional environmental protections	5/1/2006	Parolari (Linker, Winn)	exempt maintenance dredging activities under maintenance of transportation structure condition via guidance to staff to ensure continued environmental protection but minimal duplication of effort	on track
4	Streamline property owner notification	1	Clarify definitions of directly adjacent land owners (USCOE) and riparian landowners (VADEQ)	6/1/2006	Harold (Linker, Norris)	Examine definitions and propose changes to regulation if needed	on track
		2	Examine statute to determine if change is needed	9/1/2006	Harold (Linker, Norris)	Coordinate with water policy to determine if statute allows change or if legislative change needed	on track
		3	Clarify SWCL and/or VWPPP regulations to specify which permit actions require riparian land owner notification; When administrative major modifications occur, such as a permit term extension or changes to document submittal dates, riparian notifications add no value and take admin staff time.	9/1/2006	Winn(Linker)	Seek OAG opinion on what permit actions notifications apply to (in particular they should not apply to permit modifications that do not result in changed impacts or significant changes to permit conditions); Modify guidance or change regulations or statute so that time and money are saved by reducing non-significant notifications	on track
		4	Reassign responsibility for adjacent and riparian landowner notifications from DEQ to permit applicant	1/30/2007	Harold (Winn)	Change VWP regulation at time of next revision to reflect new procedure; change permit manual and website	on track

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5	Improve permit quality, consistency and level of dedicated resources	1	Develop plan to strengthen and systematize training, guidance, mentoring and internal communications to increase number and benefit of peer reviews, knowledge sharing, and transfer of best practices	10/30/2006	Davis (Kalnins, Harold, Mongold, Parolari)	Evaluate VWP staff training requirements/coordinate with Career Path efforts; look at ways to use peer review instead of vertical review to improve efficiency; develop procedures for efficient review of permits and plans; use peer to peer training to communicate best practices	on track
		2	Explore funding mechanisms for dedicated compliance and permitting staff	7/1/2006	Frahm	Water policy to evaluate as part of legislative package	on track
		3	Pilot use of dedicated compliance and permitting staff in PRO	1/20/2006	Golden	Pro has staff person assigned only to this area versus permit issuance	complete
		4	Establish primary point of contact to communicate with permit applicants (ie, assign geographic territories to permit writers, or other methods)	5/1/2006	Harold (Parolari, Linderman)	Make list of pros and cons; suggest to program managers; explore how to implement fully or partially to provide better communications between DEQ and applicants	on track
		5	Conduct customer satisfaction surveys or other feedback mechanisms as inputs to performance management	11/30/2006	Winn (Mongold)	Develop feedback form; place on DEQ website. 4/17/06 VWP Survey complete: http://www.deq.virginia.gov/wetlands/contact.html	Complete
		6	Utilize DEQ workforce development plan to improve staff retention, training and productivity	12/30/2006	Hawkins, Mongold	Career Path addressing these issues -- most VWP staff in Phase I (permit writers and inspectors); rest in Phase II (scientists and regulation and guidance writers)	on track
		7	Develop curriculum specific to VWP program to improve staff training	12/30/2006	Davis (Kalnins, Harold, Mongold, Parolari)	(see 5-1 above)	on track
		8	Develop improved guidance on specific issues and better tools (interactive and cross-referenced permit manuals). Share with regulated community	3/1/2007	Harold (Parolari, Winn, Davis)	1. Develop list of what guidance exists and what's needed. BW 12/20/05: Started list of needed guidance based on my notes. 2. Prioritize writing guidance to address iddues identified	on track
6	Dispute Resolution	1	Assign ombudsman in instances where there are interagency or applicant/agency differences of professional opinion	3/1/2006	Gilinsky, Harold	This action is not needed as the formal dispute resolution process sets out procedure under which to air difference of opinion	Complete
		1A	Evaluate current process and role of central office technical and regulatory resources.	5/1/2006	Gilinsky, Harold	1. Formal dispute resolution process should help with current opinion shopping 2. Clarify for regions and for public technical experts in central office and their role 3. work with regional VWP managers to improve process for dissemination of technical and regulatory information and decisions	on track
		1B	Regular coordination meetings with COE	9/1/2006	Gilinsky, Harold	Evaluate need and benefits of such meetings	on track
		2	Formal dispute resolution process	9/30/2005	Linker	DEQ has implemented policy for all media	Complete

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7	Streamline Permit Modification Process	1	Minimize amount of time staff and permittees spend on low risk modifications				
		1A	Examine feasibility of establishing classification system based on risk levels and link these to type/level of permit amendment	9/1/2006	Harold (Foster, Crowther)	Examine modification types and if they are described correctly; 2. make list of what should be considered minor; 3. develop list of needed changes to categories, and both DEQ and permittee timelines for implementing mod's. BW 12/21/05 Started list of references to modifications and planned changes from Code/Regulations/Manual. BW 1/18/06 Started list of needed changes to law/regs.	on track
		1B	Consider expanding category for minor modifications and develop time-frame to implement	9/1/2006	Harold, Winn		on track
		1C	Establish time-lines for permit modifications	9/1/2006	Harold, Winn	Establish goal times for modifications and communicate to staff via permit manual and put on web page; determine if these timeframes need to be put in regulation at time of next modification	on track
		1D	Customize steps in permit modification review process to align requirements with risk levels	9/1/2006	Parolari, Foster, Crowther	BW 12/21/05 Started list of references to modifications and planned changes from Code/Regulations/Manual. BW 1/18/06 Started list of needed changes to law/regs.	on track
		2	Ensure public understands permit modification process; Clearly explain and communicate modification process to staff, permit applicants, and the public	3/1/2006	Harold, Winn	Permit manual and web pages have been revised	Complete
		1	Apply for grants and investigate additional funding options; Utilize 3-year EPA grant to develop and implement compliance strategy	10/1/2005	Gilinsky, Harold	Applied for and received 3 year EPA grant to implement inspection and compliance program for VWP	complete
8	Increase compliance assurance	2	Evaluate manpower requirements for increased inspection and monitoring	10/1/2006	Harold (Davis, inspection coordinator)	this will be done as part of grant	on track
		3	Define inspection scopes	12/1/2006	Harold (Davis, inspection coordinator)	this will be done as part of grant	on track
		4	Leverage partnerships with other agencies and other DEQ programs to increase inspection coverage	9/1/2006	Harold (Davis, inspection coordinator)	working with DCR to better coordinate inspections; talkg to Corps about coordinating site inspections; model partnership used by VPDES inspectors for VWP; develop pros and cons list for multi media inspections	on track
		5	Identify cross-training needs for DEQ staff	10/1/2006	Davis, Mongold	this is being done as part of Career Path	on track
		6	Measure improvements in efficiency and environmental protection	9/30/2007	Harold (Davis, inspection coordinator)	this will be done as part of grant	on track
		7	Simplify construction monitoring reporting	10/1/2006	Parolari, Crowther	Evaluate current protocols and what effects changing them would have on staffa nd environment	on track